

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-against-

FELIX SATER,

Defendant

No. 98-CR-1101 (ILG)

**DECLARATION OF DAVID BRALOW**

I, DAVID BRALOW, declare as follows:

1. I submit this declaration in support of First Look Media Works, Inc.'s motion to intervene and to unseal court records.
2. I am an attorney employed by First Look Media Works, Inc. to serve as the First Amendment Counsel to *The Intercept*, a non-profit news organization.
3. I have been admitted to the following courts and bars: Pennsylvania (November 19, 1986); Florida (July 21, 1989); New York (January 3, 2007) (NY Bar No. 4471835); United States District Court for the Southern District of New York (January 3, 2017). I am in the process of seeking admission to the Eastern District of New York.
4. I am currently in good standing with all states, courts and bars in which I am admitted.
5. Johnny Dwyer is a contributing writer to TI. He is also the author of an upcoming book on the New York federal courts, *The Districts* (Alfred A. Knopf), and an adjunct professor at New York University's Arthur I Carter Journalism Institute.

6. In a letter dated February 12, 2019, Dwyer asked this Court to unseal filings in the above-captioned case, *U.S.A. v Felix Sater*. Among other items, Mr. Dwyer asked for the unsealing of the 5k1.1 Letter concerning cooperation, the removal of redactions in a transcript of proceedings on October 23, 2009 (Dkt. 202), and the unsealing of any other sentencing memorandum.

7. Attached to this declaration as Exhibit A are copies of news reports and publications reporting statements publicly made by Mr. Felix Sater. These published reports are not offered for proof of the truth of the matters set forth in them but as proof that the matters set forth were part of the public record at relevant times.

8. Attached to this declaration as Exhibit B is a March 12, 2018 article published by BuzzFeed News.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Executed in New York, New York, this 25th day of March, 2019.



David Bralow